

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ABEL GARZA,

Plaintiff,

v.

**ENERGY TRANSFER PARTNERS,
L.L.C. and LA GRANGE ACQUISITION,
L.P.,**

Defendants.

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CIVIL ACTION NO. 3:23-cv-00027-D

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Rules 7.1, 7.2, and 56.2-56.7 of the Court's Local Civil Rules, Defendants Energy Transfer Partners, L.L.C. and La Grange Acquisition, L.P. ("Defendants") move the Court for summary judgment in its favor and dismissal of all of Plaintiff Abel Garza's ("Plaintiff") claims on the ground that there is no genuine dispute as to any material fact. In support of its Motion for Summary Judgment (the "Motion") and in accordance with Local Rule 56.5(a), Defendant has simultaneously filed its Brief in Support of Motion for Summary Judgment ("Brief"), which sets forth the facts, arguments, and authorities entitling Defendants to judgment as a matter of law. Pursuant to Local Rule 56.3(b), the contents of the Motion required by Local Rule 56.3(a)(1) will be set forth in Defendant's Brief. Additionally, in support of its Motion, Defendant has simultaneously filed a separate, self-contained Appendix with the evidence Defendants relied on for factual support. *See* Local Rule 56.6. Citations to the Appendix supporting Defendant's Motion are also contained in the Brief as required by Local Rule 56.5(c).

Based on the facts, arguments, and authorities in the Brief, along with the materials in the Appendix, there is no genuine dispute as to any material fact, and Defendants are entitled to judgment as a matter of law. Therefore, Defendants respectfully request that the Court enter an order granting Defendants' Motion for Summary Judgment and a final judgment entirely dismissing with prejudice all of Plaintiff's claims.

Dated: January 4, 2024

Respectfully submitted,

/s/ Kelley Edwards

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CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2024, the foregoing was electronically filed with the Clerk of the Court, utilizing the ECF system, which sent notification of such filing to the following:

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